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Attorneys for Universal Leader Investment Limited, Glove Assets Investment Limited, and Truly Great Global Limited

IN THE UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:
ZETTA JET USA, INC., a California corporation,
Debtor.

Lead Case No.: 2:17-bk-21386-SK

Chapter 7

Jointly Administered With:
Case No.: 2:17-bk-21387-SK

RESERVATION OF RIGHTS REGARDING OBJECTIONS TO INTERIM FEE APPLICATIONS

[Relates to ECF Nos. 1258, 1519, 1773, 1887, 1889, 1966, 2034, 2119, 2290, 2371, 2460 and 2556]

In re:
ZETTA JET PTE, LTD., a Singaporean corporation,
Debtor

Hearing:
Date: July 29, 2025
Time: 10:00 a.m. (PDT)
Place: Courtroom 1668
 255 East Temple Street
 Los Angeles, California 90012
Judge: Hon. Barry Russell

Universal Leader Investment Limited (“UL”), Glove Assets Investment Limited (“Glove”), and Truly Great Global Limited (“TG”, together with UL and Glove the “**UL Parties**”) through their undersigned counsel, submit this *Reservation of Rights* (the “**ROR**”) regarding the *Notice of Hearing on Interim Fee Applications* [ECF 2556]. In support of this ROR, the UL Parties respectfully state as follows:

RESERVATION OF RIGHTS

1. On June 26, 2025, the Chapter 7 trustee (the “**Trustee**”) in the above-captioned cases (the “**Chapter 7 Cases**”) filed the *Chapter 7 Trustee’s Notice of Motion and Motion for Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure Approving Settlement Agreement by and Among Chapter 7 Trustee and UL Parties* [ECF 2558] (the “**Settlement Motion**”).¹

2. Pursuant to the Settlement Agreement, the UL Parties conditionally agreed (i) to withdraw with prejudice their objections to the Trustee's fee applications filed as of the date of the Settlement Agreement; and (ii) not object to future fee applications filed by the Trustee in these Chapter 7 Cases.

3. As provided in Paragraph 7 of the Settlement Agreement, the UL Parties' obligation to withdraw their pending objections to the Trustee's fee applications is conditioned upon the Court's approval of the Interim Distribution Plan on a final basis. As provided in Paragraph 8(C) of the Settlement Agreement, the UL Parties' agreement not to object to future fee applications filed by the Trustee is contingent upon (a) the fee examiner determining such fee applications to be reasonable; and (b) the fee applications being consistent with the budget attached to the Interim Distribution Approval Order.

Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Settlement Motion.

1 4. In the event that either the Settlement Agreement or the Interim Distribution Plan are
2 not approved by this Court on a final basis, or if the fee examiner determines that any requested fees
3 in the Trustee's fee applications are not reasonable, the UL Parties expressly preserve their rights to
4 object to the Trustee's fee applications.

CONCLUSION

6 WHEREFORE, the UL Parties respectfully preserve their objection rights to the Trustee's
7 interim fee applications as outlined above and in accordance with the terms of the Settlement
8 Agreement.

10 | Dated: July 14, 2025

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Brian K. Condon
Brian K. Condon (Bar No. 138776)
Oscar Ramallo (Bar No. 241487)
Benjamin Mintz (admitted *pro hac vice*)
*Attorneys for Universal Leader Investment
Limited, Glove Assets Investment Limited, and
Truly Great Global Limited*

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Arnold & Porter Kaye Scholer LLP
777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017-5844

A true and correct copy of the foregoing document entitled **RESERVATION OF RIGHTS REGARDING OBJECTIONS TO INTERIM FEE APPLICATIONS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On July 14, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Name	On Behalf of	Email
Kristina S Azlin	Creditor CAVIC Aviation Leasing (Ireland) 22 Co. Designated Activity Company, Defendant CAVIC Aviation Leasing (Ireland) 22 Co.; and Litigant CAVIC Aviation Leasing (Ireland) 22 Co. DAC	Kristina.Azlin@hklaw.com, ericka.mendez@hklaw.com; hapi@hklaw.com
Tanya Behnam	Defendant Avinode Inc.; Defendant World Fuel Services (Singapore) PTE; and Defendant World Fuel Services, Inc.	tbehnam@polsinelli.com, tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
Ron Bender	Debtor Zetta Jet PTE Ltd.; and Defendant World Fuel Services, Inc.	rb@lnbyg.com
Stephen F Biegenzahn	Creditor Tony Robbins Productions, Inc.	steve@sfb law.com
J Scott Bovitz	Attorney Bovitz & Spitzer and Examiner Nancy B. Rapoport	bovitz@bovitz-spitzer.com
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Brian K Condon	Creditor Li Qi, Truly Great Global Ltd., Universal Leader Investment Ltd. and	brian.condon@arnoldporter.com, edocketscalendaring@arnoldporter.com

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	Glove Assets Investment Ltd.	
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Robert Labate	Creditor AVIC International Leasing Co. Ltd.; Creditor Bombardier Aerospace Corporation; Creditor CAVIC Aviation Leasing (Ireland) 22 Co. Designated Activity Company	robert.labate@hklaw.com
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Thor D McLaughlin	Creditor Ample United Limited	tmclaughlin@allenmatkins.com, igold@allenmatkins.com
David W. Meadows	Interested Party Courtesy NEF	david@davidwmeadowslaw.com
Joshua M Mester	Defendant Minsheng Business Aviation Limited; Yuntian 3 Leasing Company Designated Activity Company; Yuntian 4 Leasing Company Designated Activity Company; Creditor Yuntian 3 Leasing Company Limited	jmester@jonesday.com
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	Leasing Company Designated Activity Company	
Sabari Mukherjee	Interested Party Courtesy NEF	notices@becket-lee.com
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Samuel Price	Defendant Jet Tech; Debtor Zetta Jet USA, Inc., Jet Tech Ltd	sprice@edzantprice.com
Oscar D Ramallo	Creditor Glove Assets Investment Ltd.; Debtor Zetta Jet USA, Inc.; Creditor Universal Leader Investment Ltd.; Defendant Glove Assets Investment Limited; Defendant Truly Great Global Limited; Defendant Universal Leader Investment Limited	oramallo@kayescholer.com
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Robyn B Sokol	Defendant Cloudera Aviation Services SDN, BHD; Interested Party Jonathan King; Plaintiff Jonathan King; Special Counsel Leech Tishman Fuscaldo & Lampl, Inc.; Trustee Jonathan D King (TR); Trustee Jonathan D King	rsokol@leechtishman.com, rsokol@leechtishman.com; lmoya@leechtishman.com; dmulvaney@leechtishman.com; kgutierrez@leechtishman.com; narango@LeechTishman.com

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United States Trustee (LA)		ustpregion16.la.ecf@usdoj.gov
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Philip S Warden	Creditor ECN Aviation, Inc.; Creditor ECN Capital Corp.; Creditor Yuntian 4 Leasing Company Limited	philip.warden@pillsburylaw.com, thomas.loran@pillsburylaw.com; kathy.stout@pillsburylaw.com; yvonne.chan@pillsburylaw.com; docket@pillsburylaw.com; david.stanton@pillsburylaw.com
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Jessica Wellington	Debtor Zetta Jet USA, Inc.; Interested Party Jonathan King; Plaintiff Jonathan D.King	jwellington@bg.law, ecf@bg.law
Claire K Wu	Creditor Bombardier Aerospace Corporation; Creditor Bombardier Inc.; Creditor Learjet, Inc.; Defendant Bombardier Aerospace Corporation; Defendant Bombardier, Inc.; Defendant Learjet Inc.	claire.wu@pillsburylaw.com, irene.hooper@pillsburylaw.com; docket@pillsburylaw.com

2. SERVED BY UNITED STATES MAIL:

On July 14, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

AU Card LLC Attn: Lori Kirkman, General Counsel 3300 North Ashton Blvd. Ste 200 Lehi, UT 84043	Brian L. Beckerman on behalf of Creditor Bombardier Aerospace Corporation; Bombardier Inc. Pillsbury Winthrop Shaw Pittman LLP 31 West 52nd Street New York, NY 10019	Bovitz & Spitzer on behalf of Examiner Nancy B. Rapoport 1100 Wilshire Blvd., Ste. 2403 Los Angeles, CA 90017-4174
CAE SimuFlite Inc. c/o Rebecca J. Winthrop	Eric Fishman on behalf of Creditor Bombardier Aerospace Corporation;	Cindy Lee Hill on behalf of Defendant Mather Aviation

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Norton Rose Fulbright US LLP 555 South Flower Street 41st Floor Los Angeles, CA 90071	Bombardier Inc. Pillsbury Winthrop Shaw Pittman LLP 31 West 52nd Street New York, NY 10019	Hill & Morris 5150 Sunrise Blvd Ste E-4 Fair Oaks, CA 95628
Stephen G Larson on behalf of Creditor Argus Bahamas Ltd; Argus Marine Ventures, Ltd., et al. Larson O'Brien LLP 555 S Flower St Ste 400 Los Angeles, CA 90071	Levene, Neale, Bender, Yoo & Brill L.L.P. on behalf of Debtor Zetta Jet USA, Inc. 10250 Constellation Blvd, #1700 Los Angeles, CA 90067	Omni Agent Solutions 5955 DeSoto Avenue Suite #100 Woodland Hills, CA 91367
Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Blvd. 13th Floor Los Angeles, CA 90067	Joseph A Roselius on behalf of Plaintiff Jonathan D. King DLA Piper LLP 444 West Lake Street, Ste. 900 Chicago, IL 60606-0089	Scout Aviation II, LLC Epps & Coulson, LLP 707 Wilshire Blvd., Suite 3000 Los Angeles, CA 90017
Seabury Corporate Finance LLC Seabury Corporate Finance LLC 1350 Avenue of Americas, 25th Floor New York, NY 10019	David S Torborg on behalf of Defendant Minsheng Business Aviation Limited; Minsheng Financial Leasing Co., Ltd.; Yuntian 3 Leasing Company Designated Activity Company; Defendant Yuntian 4 Leasing Company Designated Activity Company JONES DAY 51 Louisiana Avenue NW Washington, DC 20001-2113	U.S. Customs and Border Protection Attn: REV-Bankruptcy-203Ja 8899 E. 56th Street Indianapolis, IN 46249
Hon Sandra R. Klein United States Bankruptcy Court for the Central District of California 255 East Temple Street, Suite 1582 Los Angeles, California 90012		

Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**
(state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 14, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA HAND DELIVERY

VIA ELECTRONIC MAIL

(Party, who is being served if different, and email address for each)

Service information continued on attached page I declare under penalty of perjury under the laws
of the United States that the foregoing is true and correct.

July 14, 2025

Date

Vicky Moreno

Printed Name

/s/ Vicky Moreno

Signature

<u>20 Largest Creditors Served via Electronic Mail</u>	
Bombardier Aerospace Corporation Attn.: Carolina A. Fornos Email: carolina.fornos@pillsburylaw.com Attn.: Brian L. Beckerman Email: brian.beckerman@pillsburylaw.com Attn.: Eric Fishman Email: eric.fishman@pillsburylaw.com	Rolls-Royce Deutschland Ltd & Co KG Attn.: Michael K. McCrory Email: mmccrory@btlaw.com Attn.: Jonathan Sundheimer Email: jsundheimer@btlaw.com
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<u>Aircraft Finance and Aircraft Lease Parties by Electronic Mail</u> (if not listed above)	
Argus Marine Ventures, Ltd. Attn.: Stephen G. Larson Email: slarson@larsonobrienlaw.com	Jet Support Services (JSSI) Attn.: Richard Schumacher Email: rschumacher@jetsupport.com
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<u>Other Requests for Service by Electronic Mail</u>	
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